IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

In re: LEE EMANUEL HEEB ZAYAS Debtor	Case No. 16-06163 Chapter 13

MOTION SUBMITTING AMENDED CHAPTER 13 PLAN

TO THE HONORABLE COURT:

Comes now Debtor, represented by undersigned counsel, and very respectfully alleges and prays as follows:

1. On November 30, 2016, the Debtor filed an amended Chapter 13 Plan. See, Docket No. 2.
2. Pursuant to 11 U.S.C. § 1323, Debtor respectfully submit an amended Chapter 13 Plan in order to **include pre-petition arrears to BPPR (Amended POC #3).**

WHEREFORE, Debtor respectfully requests from this Honorable Court to take notice of the above stated.

NOTICE: Pursuant to Local Bankruptcy Rule 9013-1(h) within fourteen (14) days after service as evidence by the certification, and an additional three (3) days pursuant to Feb. R. Bank. P. 9006(f) if you were served by mail, and any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: I hereby certify that on this same date, I electronically filed the above document with the Clerk of the Court using the CM/ECF system, which will send notification, upon information and belief, of such filing to the following: CHAPTER 13 TRUSTEE AND THE UNITED STATES TRUSTEE and to all CM/ECF participants. We also certify that this same date we have mailed by United States Postal Service the document to all creditors and parties in interest as per the attached master address list.

RESPECTFULLY SUBMITTED
In San Juan, Puerto Rico this 30th day of November, 2016.

RIVERA-VELEZ & SANTIAGO, LLC
Vela St. # 9, Suite 100
San Juan, PR 00918
Tel. (787) 469-8913 / (787) 691-5903

/s/ William Rivera Vélez ________
WILLIAM RIVERA VÉLEZ
USDC No. 229408
E-mail: wrvlaw@gmail.com

Banco Popular de Puerto Rico
PO Box 71375
San Juan, PR 00936-8475

Bank of America
NC4-105-03-14
PO Box 26012
Greensboro, NC 27420-6012

Bk of Amer
PO Box 982238
El Paso, TX 79998-2238

Citibank Sears
Citicorp Credit Srvs/Centralized Bankrup
PO Box 790040
Saint Louis, MO 63179-0040

Credit Protection Assoc
PO Box 802068
Dallas, TX 75380-2068

Departamento de Hacienda
PO Box 9024140
San Juan, PR 00902-4140

First Bank
PO Box 9146
San Juan, PR 00908-0146

Military Star
3911 S Walton Walker Blvd
Dallas, TX 75236-1509

Military Star/Aafes
PO Box 650060
Dallas, TX 75265-0060

Oriental Bank
1000 San Roberto St
San Juan, PR 00919

Sears/Cbna
PO Box 6189
Sioux Falls, SD 57117-6189

THRIFT SAVINGS PLAN
PO Box 385021
Birmingham, AL 35238-5021

United States Bankruptcy Court
District of Puerto Rico, San Juan Division

IN RE: Case No. **16-06163**

HEEB ZAYAS, LEE EMANUEL Chapter **13**

Debtor(s)

CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☐ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: ______ ☐ PRE ☐ POST-CONFIRMATION

☑ AMENDED PLAN DATED: **11/30/2016**
Filed by: ☑ Debtor ☐ Trustee ☐ Other

I. PAYMENT PLAN SCHEDULE

$ **1,100.00** x **60** = $ **66,000.00**
$ ____ x ____ = $ ____
$ ____ x ____ = $ ____
$ ____ x ____ = $ ____
$ ____ x ____ = $ ____

TOTAL: $ **66,000.00**

Additional Payments:
$ ____ to be paid as a LUMP SUM within ____ with proceeds to come from:

☐ Sale of Property identified as follows:

☐ Other:

Periodic Payments to be made other than, and in addition to the above:
$ ____ x ____ = $ ____

PROPOSED BASE: $ **66,000.00**

III. ATTORNEY'S FEES

(Treated as § 507 Priorities)

Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: $ **2,400.00**

Signed: ***/s/ LEE EMANUEL HEEB ZAYAS***
Debtor

____
Joint Debtor

II. DISBURSEMENT SCHEDULE

A. ADEQUATE PROTECTION PAYMENTS OR ____ $ ____
B. SECURED CLAIMS:
☐ Debtor represents no secured claims.
☑ Creditors having secured claims will retain their liens and shall be paid as follows:

1. ☑ Trustee pays secured ARREARS:

Cr. **Banco Popular de Pı**	Cr.	Cr.
# **8120700023310**	#	#
$ **249.72**	$	$

2. ☐ Trustee pays IN FULL Secured Claims:

Cr.	Cr.	Cr.
#	#	#
$	$	$

3. ☐ Trustee pays VALUE OF COLLATERAL:

Cr.	Cr.	Cr.
#	#	#
$	$	$

4. ☐ Debtor SURRENDERS COLLATERAL to Lien Holder:

5. ☐ Other:

6. ☑ Debtor otherwise maintains regular payments directly to:
Banco Popular de Pı **THRIFT SAVINGS PL** **Banco Popular de Pı**

C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)

D. UNSECURED CLAIMS: Plan ☐ Classifies ☑ Does not Classify Claims.

1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: ____
☐ Paid 100% / ☐ Other: ____

Cr.	Cr.	Cr.
#	#	#
$	$	$

2. Unsecured Claims otherwise receive PRO-RATA disbursements.

OTHER PROVISIONS: *(Executory contracts; payment of interest to unsecureds, etc.)*
TRUSTEE WILL PAY ATTORNEY'S FEES FIRST.

TAX REFUND PROVISION: ANY POST PETITION INCOME TAX REFUNDS THAT THE DEBTOR(S) WOULD BE ENTITLED TO RECEIVE DURING THE TERM OF THE PLAN WILL BE USED TO FUND THIS PLAN. AFTER ITS CONFIRMATION, AND WITHOUT FURTHER NOTICE, HEARING OR COURT ORDER, THE PLAN SHALL BE DEEMED MODIFIED BY THE INCREMENT(S) TO ITS BASED, IN AN AMOUNT EQUAL TO THE AMOUNT OF EACH INCOME TAX REFUNDS.

Attorney for Debtor **Rivera-Velez & Santiago LLC** Phone: **(787) 691-5903**

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